



NOV 08 2016

Jerrett Hollis
Perfection Pet Foods, LLC
PO Box 1029
Goshen, CA 93227

RE: Notice of Final Action - Authority to Construct
Facility Number: S-8001
Project Number: S-1162655

Dear Mr. Hollis:

The Air Pollution Control Officer has issued the Authority to Construct permits to Perfection Pet Foods, LLC for dryer modifications, at 1111 N Miller Park Court, Visalia, CA. Enclosed are the Authority to Construct permits and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue the Authority to Construct permits was published on August 3, 2016. The District's analysis of the proposal was also sent to CARB on July 29, 2016. No comments were received following the District's preliminary decision on this project.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,



Arnaud Marjolle
Director of Permit Services

AM:rue

Enclosures

cc: Tung Le, CARB (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



Facility # S-8001
PERFECTION PET FOODS, LLC
P.O. BOX 1029
GOSHEN, CA 93227

AUTHORITY TO CONSTRUCT (ATC)

QUICK START GUIDE

1. **Pay Invoice:** Please pay enclosed invoice before due date.
2. **Fully Understand ATC:** Make sure you understand ALL conditions in the ATC prior to construction, modification and/or operation.
3. **Follow ATC:** You must construct, modify and/or operate your equipment as specified on the ATC. Any unspecified changes may require a new ATC.
4. **Notify District:** You must notify the District's Compliance Department, at the telephone numbers below, upon start-up and/or operation under the ATC. Please record the date construction or modification commenced and the date the equipment began operation under the ATC. You may NOT operate your equipment until you have notified the District's Compliance Department. A startup inspection may be required prior to receiving your Permit to Operate.
5. **Source Test:** Schedule and perform any required source testing. See http://www.valleyair.org/busind/comply/source_testing.htm for source testing resources.
6. **Maintain Records:** Maintain all records required by ATC. Records are reviewed during every inspection (or upon request) and must be retained for at least 5 years. Sample record keeping forms can be found at http://www.valleyair.org/busind/comply/compliance_forms.htm.

By operating in compliance, you are doing your part to improve air quality for all Valley residents.

**For assistance, please contact District Compliance staff at
any of the telephone numbers listed below.**

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Executive Director/Air Pollution Control Officer

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Modesto, CA 95356-8718
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AUTHORITY TO CONSTRUCT

PERMIT NO: S-8001-3-2

ISSUANCE DATE: 10/27/2016

LEGAL OWNER OR OPERATOR: PERFECTION PET FOODS, LLC

MAILING ADDRESS: P.O. BOX 1029
GOSHEN, CA 93227

LOCATION: 1111 N MILLER PARK COURT
VISALIA, CA 93291

EQUIPMENT DESCRIPTION:

MODIFICATION OF 300 HP EXTRU-TECH MODEL E750 EXTRUDER DISCHARGING TO AN 8 MMBTU/HR NATURAL GAS-FIRED EXTRU-TECH MODEL 1042-2P-AFII DRYER COOLER, 400 HP EXTRU-TECH MODEL E925 EXTRUDER DISCHARGING TO A 12 MMBTU/HR NATURAL GAS-FIRED EXTRU-TECH MODEL 1852-AFII DRYER COOLER, PRODUCT COATING, CONVEYORS, ELEVATORS, AUGERS, AND TURN HEADS: INCREASE CO LIMIT OF DRYER COOLERS TO 20 PPMV @ 19% O₂

CONDITIONS

1. ATC S-8001-3-1 shall be implemented prior to or concurrent with this ATC. [District Rule 2201]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. The units shall only be fired on PUC regulated natural gas. [District Rules 2201, 4309, and 4801]
5. Emissions from the natural gas-fired unit shall not exceed any of the following limits: 2.12 ppmvd NO_x @ 19% O₂ (equivalent to 0.024 lb-NO_x/MMBtu), 0.0076 lb-PM₁₀/MMBtu, 20 ppmvd CO @ 19% O₂ (equivalent to 0.1392 lb-CO/MMBtu), or 0.0055 lb-VOC/MMBtu. If measured O₂ concentration is greater than 19%, the corrected NO_x or CO concentration is equal to the measured NO_x or CO concentration. [District Rules 2201, 4201, 4301, and 4309]
6. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Sayed Sadredin, Executive Director / APCO



Arnaud Marjollet, Director of Permit Services

S-8001-3-2; Oct 27 2016 10:26AM - EDGEHLR : Joint Inspection NOT Required

7. If either the NO_x or CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309]
8. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
9. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309]
10. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309]
11. Source testing to measure NO_x and CO emissions from this unit when fired on natural gas shall be conducted once every 24 months. [District Rules 2201 and 4309]
12. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309]
13. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
14. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
15. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]
16. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
17. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
18. All test results for NO_x and CO shall be reported in ppmv @ 19% O₂ (or no correction if measured above 19% O₂), corrected to dry stack conditions. [District Rule 4309]
19. Permittee shall maintain records which demonstrate the units are fired exclusively on PUC quality natural gas. [District Rules 2201 and 4309]
20. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4309]